

Appendix A

Cassava's Allegations of Falsity & Actual Malice as to QCM's Defamatory Statements

QCM's Defamatory Statements ¹	Cassava's Allegations of Falsity	Cassava's Allegations of Actual Malice	
<p>After reviewing the information in its entirety, we are of the opinion that Cassava Sciences could be a scheme orchestrated by management to enrich itself at the expense of shareholders, patients, and the US Federal government.</p> <p>(FAC ¶ 140; Ex. 8 to FAC, at 4.)</p>	FAC ¶¶ 141, 162–167	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365
<p>Simufilam, Cassava's only prospective drug, appears based on allegedly forged scientific research. Phase II trials have been conducted with numerous and serious irregularities which appear to have allowed management to deceive investors about the effectiveness of the drug.</p> <p>(FAC ¶ 140; Ex. 8 at 4.)</p>	FAC ¶¶ 141, 162–167	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315
		Common Knowledge in the Scientific Community:	FAC ¶¶ 316–330
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Inherently Improbable:	FAC ¶¶ 347–358

¹ All emphases have been removed.

QCM's Defamatory Statements ¹	Cassava's Allegations of Falsity	Cassava's Allegations of Actual Malice	
		Repetition and Republication:	FAC ¶¶ 359–365
<p>In our opinion, Simufilam is a worthless compound, and any touted benefit is [] likely the result of a combination of forgery, “cherry picking” of patients and statistical manipulation of data, of which we have plenty of disturbing evidence.</p> <p>(FAC ¶ 140; Ex. 8 at 4.)</p>	FAC ¶¶ 141, 162–167	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315
		Common Knowledge in the Scientific Community:	FAC ¶¶ 316–330
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365
<p>In several years of fraud-busting we have rarely come across a more blatant and costlier exercise in deception than Cassava. Besides threatening shareholders' funds, Cassava is diverting patients, resources and conspicuous government funds from legitimate studies toward a drug which we believe is useless and doomed to fail under closer scrutiny of phase III trials, if it ever gets there.</p> <p>(FAC ¶ 140; Ex. 8 at 5.)</p>	FAC ¶¶ 141, 162–167	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315
		Common Knowledge in the Scientific Community:	FAC ¶¶ 316–330

QCM's Defamatory Statements ¹	Cassava's Allegations of Falsity	Cassava's Allegations of Actual Malice	
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365
<p>If our allegations are substantiated, we believe Cassava's behavior might constitute securities fraud, FDA fraud and a violation of the False Claims Act. As such, we have alerted all relevant federal institutions which have received a copy of this report.</p> <p>(FAC ¶ 142; Ex. 8 at 5.)</p>	FAC ¶¶ 162–167	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315
		Common Knowledge in the Scientific Community:	FAC ¶¶ 316–330
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365
<p>Cassava Sciences (SAVA): Game over! A warning for the US healthcare system</p> <p>(FAC ¶ 161; Ex. 8 at 2.)</p>	FAC ¶¶ 140, 162–167	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315

QCM's Defamatory Statements ¹	Cassava's Allegations of Falsity	Cassava's Allegations of Actual Malice	
		Common Knowledge in the Scientific Community:	FAC ¶¶ 316–330
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365
<p>We have had multiple experts review the “Citizen Petition” and found it highly credible. However, upon reviewing Cassava’s claims, we became convinced that the alleged deception could not have been limited to the laboratory analysis mentioned in the complaint. Instead, we suspect that the entire clinical research process might have been tainted by deception and misconduct, especially the Simufilam clinical trials.</p> <p>(FAC ¶ 161; Ex. 8 at 7–8.)</p>	FAC ¶¶ 162–167	Improper Motive:	FAC ¶¶ 290–294
		Lack of Evidence:	FAC ¶¶ 295–299
		Contradictory Information:	FAC ¶¶ 302–307
		Common Knowledge in the Scientific Community:	FAC ¶¶ 316–330
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365
	FAC ¶¶ 162–167	Improper Motive:	FAC ¶¶ 290–291, 294

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<p>Based on the extensive evidence we reviewed, we fear that Cassava has been corrupting the entire drug development process to temporarily inflate Cassava's stock to the market capitalization required for management to maximize its bonuses.</p> <p>(FAC ¶ 161; Ex. 8 at 21.)</p>		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315
		Common Knowledge in the Scientific Community:	FAC ¶¶ 316–330
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365
<p>The report, which we strongly recommend reading, contains dozens of allegedly doctored photographs, observations of statistical anomalies and other hard evidence strongly suggesting that Simufilam's research and laboratory analysis have been forged, in all likelihood with the intent of falsifying the drug's mechanism of action and falsely claiming success in reducing certain biomarkers associated with Alzheimer's Disease.</p> <p>(FAC ¶ 161; Ex. 8 at 22.)</p>	FAC ¶¶ 162–167	Improper Motive:	FAC ¶¶ 290–294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315
		Common Knowledge in the Scientific Community:	FAC ¶¶ 316–330
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Inherently Improbable:	FAC ¶¶ 347–358

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		Repetition and Republication:	FAC ¶¶ 359–365
<p>Besides the alleged forgery of Cassava's background clinical research, we strongly suspect that Cassava may have similarly distorted the outcome of the trials as well. The mechanism for the alleged falsification of the study may verge on a few critical points: Using Phase II trials, normally geared toward establishing safety and dosage, to make unsubstantiated claims on the efficacy of the drug; Allowing patients who may not suffer from Alzheimer's Disease into the study, thereby biasing the sample; Strategically excluding patients from the studies who have undesirable clinical outcomes, artificially flattering the efficacy of the drug; Comparing the results of the study with other studies having a population with a higher incidence of Alzheimer's patients; Using questionable, and possibly conflicted, clinical research centers to overlook these anomalies; Monitoring the trials "in house" only, without the customary third-party scrutiny, which might detect irregular practices</p> <p>(FAC ¶ 161; Ex. 8 at 24–25.)</p>	FAC ¶¶ 162–167	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–296, 298–299
		Contradictory Information:	FAC ¶¶ 305–307
		Common Knowledge in the Scientific Community:	FAC ¶¶ 328–330
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–343, 345–346
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365
<p>"First, we learned that patients and whoever introduces them to the centers receive sums of money that many consultants have found excessive[fn] and potentially leading to conflicts in patient selection. In fact, while chatting in the waiting rooms of these centers, we learned that there are large numbers of 'professional patients' who go from study to study just to seek these monetary rewards. Many 'patients' during our visit appeared quite normal (cognitively speaking) and were exchanging tips about what to say to the staff in order to get their study money (!)."</p> <p>(Ex. 8 at 32.)</p>	FAC ¶ 208	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–296, 298–299
		Contradictory Information:	FAC ¶¶ 305–307
		Common Knowledge in the Scientific Community:	FAC ¶¶ 328–330

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		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–343, 345–346
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365
<p>If these allegations are confirmed, Cassava's management may be committing securities fraud (again), FDA fraud and is in violation of the False Claims Act. Cassava would also be exposed to crippling litigation from patients who joined the study unnecessarily. We have accordingly informed all relevant agencies who received a copy of this report and all the related documents.</p> <p>(FAC ¶ 161; Ex. 8 at 39.)</p>	FAC ¶¶ 162–167; 267–272	Improper Motive:	FAC ¶¶ 290–294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315
		Common Knowledge in the Scientific Community:	FAC ¶¶ 316–330
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365
<p>Cassava's initial research has received extensive funding from the federal government through the NIH: those funds could have been directed toward other ventures with a real chance to provide relief for this terrible disease. Similarly, hundreds of patients are being</p>	FAC ¶¶ 169–173	Improper Motive:	FAC ¶¶ 290–294
		Lack of Evidence:	FAC ¶¶ 295–296, 298–299

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<p>unnecessarily led into the Simufilam study, being exposed to potentially dangerous chemicals, when they could have participated in studies with a real chance of success.</p> <p>(FAC ¶ 168; Ex. 8 at 38.)</p>		Contradictory Information:	FAC ¶¶ 305–307
		Common Knowledge in the Scientific Community:	FAC ¶¶ 328–330
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–343, 345–346
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365
<p>According to our thesis, Cassava may have initially relied on fraudulent background research generated by its main author Dr. Wang (who co-and his alleged accomplices concerning Simufilam's mechanism of action and apparent effects. Cassava then proceeded with Phase I and Phase II trials extending the deception and manipulating the trials' design, execution, and outcomes to claim a non-existing clinical efficacy.</p> <p>(FAC ¶ 174; Ex. 8 at 21.)</p>	FAC ¶¶ 175–178	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315
		Common Knowledge in the Scientific Community:	FAC ¶¶ 316–330
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365

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<p>A number of forensic experts including, Dr. Elizabeth Bik and consultants hired by QCM, have systematically reviewed the documents and confirmed the allegations, pointing out that Cassava and Dr. Wang could have easily disputed the claims simply releasing the originals of the images in question (for the record: they haven't).</p> <p>(FAC ¶ 179; Ex. 8 at 22.)</p>	FAC ¶¶ 180–188	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315
		Common Knowledge in the Scientific Community:	FAC ¶¶ 316–323, 330
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–341, 345–346
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365
<p>We detected multiple red flags in this study, starting from its inclusion criteria: in other studies we reviewed, only patients with Alzheimer's per rigorous diagnostic standards are included. On the other hand, in the recent Cassava 64-person study inclusion criteria specify "diagnosis of dementia due to possible or probable Alzheimer's Disease" and allow MMSE cognitive scores as high as 26, which is defined as "normal cognition". With such inadequate enrollment criteria, it is almost certain that there will be patients in the study who do not have Alzheimer's disease (some may have non-Alzheimer's dementia or simple, age-related memory loss). This presents a major problem in the study as any sample of these patients is likely to show better symptoms progression if compared with studies which included exclusively people with certain Alzheimer's: Cassava may be using exactly this discrepancy in</p>	FAC ¶¶ 206–209	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–296, 298–299
		Contradictory Information:	FAC ¶¶ 305–307
		Common Knowledge in the Scientific Community:	FAC ¶¶ 328–330
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–343, 345–346

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<p>pages 20-21 of its presentation to investors to dubiously claim the efficacy of its drug.</p> <p>(FAC ¶ 205; Ex. 8 at 25.)</p>		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365
<p>The published biomarker results, however, were for only 14, 13, and 10 subjects, respectively: turns out that Cassava has excluded as many as 27 patients out of 64 (42% of total) from the final study results for such implausible reasons as too getting too many or too few correct answers in the cognitive tests, and for other highly dubious explanations.</p> <p>(FAC ¶ 205; Ex. 8 at 25.)</p>	FAC ¶¶ 206–209	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–296, 298–299
		Contradictory Information:	FAC ¶¶ 305–307
		Common Knowledge in the Scientific Community:	FAC ¶¶ 328–330
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–343, 345–346
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365
<p>Other Alzheimer's studies reviewed by our consultants do not exclude patients for this sort of reasons</p> <p>(FAC ¶ 205; Ex. 8 at 25.)</p>	FAC ¶¶ 206–209	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–296, 298–299
		Contradictory Information:	FAC ¶¶ 305–307

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		Common Knowledge in the Scientific Community:	FAC ¶¶ 328–330
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–343, 345–346
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365
<p>We believe that Cassava excluded patients to create artificially promising report on the efficacy of the drug because 1) the groups taking the drug had the largest number of patients excluded, 2) the placebo group had the worst initial cognitive scores and the worst tau/Ab42 (associated with worse prognosis), 3) the fact that Cassava appears to have total discretion on which patients to exclude, without independent oversight, 4) the huge fraction of patients excluded vs initial cohorts (42%) 5) the patients' exclusion seems in conflict with the existing statistical analysis plan. We deduce that patients may have been excluded "strategically" to fabricate a false efficacy of the drug. In short: excluding the worst-performing patients from the drug cohort vs placebo would necessarily increase the average cognitive scores of patients in the sample even in total absence of drug efficacy.</p> <p>(FAC ¶ 205; Ex. 8 at 26.)</p>	FAC ¶¶ 206–209	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–296, 298–299
		Contradictory Information:	FAC ¶¶ 305–307
		Common Knowledge in the Scientific Community:	FAC ¶¶ 328–330
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–343, 345–346
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365
	FAC ¶¶ 240–245	Improper Motive:	FAC ¶¶ 290–291, 294

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<p>We believe there is convincing statistical evidence suggesting that in this study Cassava again deliberately excluded patients of Simufilam's effectiveness.</p> <p>(FAC ¶ 239; Ex. 8 at 27.)</p>		Lack of Evidence:	FAC ¶¶ 295–296, 298–299
		Contradictory Information:	FAC ¶¶ 305–307
		Common Knowledge in the Scientific Community:	FAC ¶¶ 328–330
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–343, 345–346
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365
<p>What is less obvious but can be deduced from Cassava's own statements, is that the starting cognitive score (baseline) drops over time so that the deteriorating cognitive scores can be misrepresented as "improvements".</p> <p>(FAC ¶ 239; Ex. 8 at 27.)</p>	FAC ¶¶ 240–245	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295, 298–299
		Contradictory Information:	FAC ¶¶ 305–307
		Common Knowledge in the Scientific Community:	FAC ¶¶ 328–330
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–343, 345–346
		Inherently Improbable:	FAC ¶¶ 347–358

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		Repetition and Republication:	FAC ¶¶ 359–365
<p>This can only mean one thing: Cassava didn't choose replacement patients at random (or from the same pool): it is reasonable to assume that they were deliberately selected to alter the sample's composition of the study to flatter the performance of the drug. (FAC ¶ 239; Ex. 8 at 28.)</p>	FAC ¶¶ 240–245	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–296, 298–299
		Contradictory Information:	FAC ¶¶ 305–307
		Common Knowledge in the Scientific Community:	FAC ¶¶ 328–330
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–343, 345–346
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365
<p>This alleged exercise in deception has taken place with the involvement of an astounding number of questionable characters: Cassava's former Senior Clinical Research Associate is a convicted felon with a record in fraud and theft. Cassava's prominent clinical research site (whose CEO is coauthor of critical research on Simufilam), IMIC Inc., is co-owned by a former escort, stripper and crack addict with a criminal record for consumption and possession of cocaine. IMIC's Principal Investigator has been hit with a rare and ominous FDA warning letter during recent trials. Cassava's CEO and CMO have been caught making allegedly fraudulent</p>	FAC ¶¶ 259–265, 267–272	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315
		Common Knowledge in the Scientific Community:	FAC ¶¶ 316–323, 330

QCM's Defamatory Statements ¹	Cassava's Allegations of Falsity	Cassava's Allegations of Actual Malice	
<p>statements about Simufilam's predecessor Remoxy, which duly failed, devastating shareholders. Casava's recent board addition, Richard Barry, has been involved with multiple frauds.</p> <p>(FAC ¶ 258; Ex. 8 at 4–5.)</p>		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–343, 345–46
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365
<p>Aimee Cabo, who co-owns IMIC . . . claims to be a nurse, yet a record check at the Florida Department of Health has failed to show any license. She does have another type of record, of the criminal type, with what looks like a felony arrest for possession and consumption of crack cocaine(!).</p> <p>(FAC ¶ 258; Ex. 8 at 14.)</p>	FAC ¶¶ 259–265	Improper Motive:	FAC ¶¶ 290–291, 294
		Purposeful Avoidance of the Truth:	FAC ¶¶ 344–345
		Repetition and Republication:	FAC ¶¶ 359, 364–365
<p>Regardless of who was ultimately right in this sad story, Aimee has been caught laying in a very important situation and this casts serious doubts on her credibility.</p> <p>(FAC ¶ 258; Ex. 8 at 14.)</p>	FAC ¶¶ 259–265	Improper Motive:	FAC ¶¶ 290–291, 294
		Purposeful Avoidance of the Truth:	FAC ¶¶ 344–345
		Repetition and Republication:	FAC ¶¶ 359, 364–365
<p>The Principal Investigator for the ongoing Simufilam trial, Dr. Brignoni, presumably joined IMIC befriending Aimee Cabo as a court-appointed psychiatrist during a custody trial. She is a Child and Adolescent Psychiatric Specialist, hardly a qualification to treat or diagnose a neurological disease like Alzheimer's. In fact, she was recently hit with a rare and most serious FDA warning letter for “failing to ensure that the investigation was conducted according to the investigational plan” and for multiple serious infractions related to a clinical trial she was overseeing at IMIC.</p>	FAC ¶¶ 259–265	Improper Motive:	FAC ¶¶ 290–291, 294
		Purposeful Avoidance of the Truth:	FAC ¶¶ 344–345
		Repetition and Republication:	FAC ¶¶ 359, 364–365

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(FAC ¶ 258; Ex. 8 at 15.)			
<p>However, the timeframe would be consistent, and, in any case, the letter casts doubt on the suitability of Dr. Brignoni as a Principal Investigator and of IMIC as a trustworthy institution</p> <p>(FAC ¶ 258; Ex. 8 at 16.)</p>	FAC ¶¶ 259–265	Improper Motive:	FAC ¶¶ 290–291, 294
		Purposeful Avoidance of the Truth:	FAC ¶¶ 344–345
		Repetition and Republication:	FAC ¶¶ 359, 364–365
<p>Aimee Cabo describes Juana Pelegri describes her as a “trained clinical psychologist” with expertise in diagnosing Alzheimer’s Disease.</p> <p>(FAC ¶ 258; Ex. 8 at 17.)</p>	FAC ¶¶ 259–265	Improper Motive:	FAC ¶¶ 290–291, 294
		Purposeful Avoidance of the Truth:	FAC ¶¶ 344–345
		Repetition and Republication:	FAC ¶¶ 359, 364–365
<p>We fear that, as it seems, Mrs. Pelegri is in fact not a licensed clinical psychologist and may be in charge of diagnosing Alzheimer’s patients in the Simufilam trial, something for which she would lack qualifications.</p> <p>(FAC ¶ 258; Ex. 8 at 17.)</p>	FAC ¶¶ 259–265	Improper Motive:	FAC ¶¶ 290–291, 294
		Purposeful Avoidance of the Truth:	FAC ¶¶ 344–345
		Repetition and Republication:	FAC ¶¶ 359, 364–365
<p>This is particularly important as one of our main criticism in the Simufilam trials is that many patients may not have been suffering from Alzheimer’s.</p> <p>(FAC ¶ 258; Ex. 8 at 17.)</p>	FAC ¶¶ 259–265	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–296, 298–299
		Contradictory Information:	FAC ¶¶ 305–307

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		Common Knowledge in the Scientific Community:	FAC ¶¶ 328–330
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–343, 345–346
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365
<p>IMIC is co-led by a Boris Nikolov, a 51-year-old-immigrant from Bulgaria. Mr. Nikolov has a medical license in Bulgaria, but not in the US (though “MD” occasionally appears next to his name). Our background checks on Mr. Nikolov in Bulgaria revealed a close business association with a Kirstin Valentinova Zaharieva, a real estate investor with 2 criminal records for fraud.</p> <p>(FAC ¶ 258; Ex. 8 at 18.)</p>	FAC ¶¶ 259–265	Improper Motive:	FAC ¶¶ 290–291, 294
		Purposeful Avoidance of the Truth:	FAC ¶¶ 344–345
		Repetition and Republication:	FAC ¶¶ 359, 364–365
<p>Interestingly, only a few years later, about when IMIC starts collaborating with Cassava, the financial situation for the couple improves dramatically</p> <p>(FAC ¶ 258; Ex. 8 at 18.)</p>	FAC ¶¶ 259–265	Improper Motive:	FAC ¶¶ 290–291, 294
		Purposeful Avoidance of the Truth:	FAC ¶¶ 344–345
		Repetition and Republication:	FAC ¶¶ 359, 364–365
<p>We find the sudden change of fortune remarkable and wonder whether it might be related to IMIC's relationship with Cassava and the noted anomalies in the study.</p>	FAC ¶¶ 259–265	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–296, 298–299

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(FAC ¶ 258; Ex. 8 at 18–19.)		Contradictory Information:	FAC ¶¶ 305–307
		Common Knowledge in the Scientific Community:	FAC ¶¶ 328–330
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–343, 345–346
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365
<p>This alleged exercise in deception has taken place with the involvement of an astounding number of questionable characters: Cassava's former Senior Clinical Research Associate is a convicted felon with a record in fraud and theft. Cassava's prominent clinical research site (whose CEO is coauthor of critical research on Simufilam), IMIC Inc., is co-owned by a former escort, stripper and crack addict with a criminal record for consumption and possession of cocaine. IMIC's Principal Investigator has been hit with a rare and ominous FDA warning letter during recent trials. Cassava's CEO and CMO have been caught making allegedly fraudulent statements about Simufilam's predecessor Remoxy, which duly failed, devastating shareholders. Casava's recent board addition, Richard Barry, has been involved with multiple frauds.</p> <p>(FAC ¶ 266; Ex. 8 at 4–5.)</p>	FAC ¶¶ 267–272	Improper Motive:	FAC ¶¶ 290–291, 294
		Purposeful Avoidance of the Truth:	FAC ¶¶ 344–345
		Repetition and Republication:	FAC ¶¶ 359, 364–365
	FAC ¶¶ 267–272	Improper Motive:	FAC ¶¶ 290–291, 294

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<p>The alleged, generalized misconduct at Simufilam trials could not have been possible without the presence of people of questionable character involved at every level of the process. Indeed, we have never detected a higher concentration of felons, fraudsters, and generally incompetent people around any public company, let alone a healthcare one.</p> <p>(FAC ¶ 266; Ex. 8 at 10.)</p>		Lack of Evidence:	FAC ¶¶ 295–296, 298–299
		Contradictory Information:	FAC ¶¶ 305–307
		Common Knowledge in the Scientific Community:	FAC ¶¶ 328–330
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–343, 345–346
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365
<p>It is astounding that, for the trials at Cassava, such a role has been assigned to the following individual: Convicted fraudster and felon Hilda *** a.k.a. Hilda ***, CRA of Cassava Sciences</p> <p>(FAC ¶ 266; Ex. 8 at 11.)</p>	FAC ¶¶ 267–272	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–296
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331, 344–345
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365
<p>More worryingly, we found a criminal and arrest record for Hilda, including a felony for theft (for which she appears to have served two years in prison) and a Class A misdemeanor for “fraudulent</p>	FAC ¶¶ 267–272	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–296

QCM's Defamatory Statements ¹	Cassava's Allegations of Falsity	Cassava's Allegations of Actual Malice	
<p>activities”, apparently for defrauding unemployment insurance. Based on her record, she might even have been on probation while working for Cassava as senior CRA!</p> <p>(FAC ¶ 266; Ex. 8 at 12.)</p>		Purposeful Avoidance of the Truth:	FAC ¶¶ 331, 344–345
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365
<p>According to our sources, Hilda may have been substituted as monitor by Mr. Nadav Friedman, Cassava's CMO, who has been caught making allegedly fraudulent statements along with Remi Barbier regarding Cassava's previous, failed drug. More on this later. It is superfluous to point out that assigning the role of primary watchdog first to a serial liar and convicted felon, then to a company insider with a record of securities fraud and in conflict of interest, does not bode well for the legitimacy of the Simufilam trials and may explain the irregularities that we have identified earlier.</p> <p>(FAC ¶ 266; Ex. 8 at 12.)</p>	FAC ¶¶ 267–272	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–296
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331, 344–345
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365
<p>In Cassava, there are a number of red flags: in some cases role of monitor has been assigned to Nadav Friedman, the Company's Chief Medical Officer and Chief Operating Officer. That a company's executive be placed in such a position is both unusual (it's a very tedious job for a senior figure) and worrying (it creates a conflict of interest as Cassava is unlikely to blow the whistle on itself).</p> <p>(FAC ¶ 266; Ex. 8 at 30.)</p>	FAC ¶¶ 267–272	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–296
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331, 345
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365

QCM's Defamatory Statements ¹	Cassava's Allegations of Falsity	Cassava's Allegations of Actual Malice	
<p>This is even more disturbing considering that Mr. Friedman has been sued for securities fraud for making allegedly fraudulent statements regarding Cassava's former drug Remoxy (FAC ¶ 266; Ex. 8 at 30.)</p>	FAC ¶¶ 267–272	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–296
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331, 345
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365
<p>According to the legal proceedings we reviewed, Remi Barbier and Nadav Friedmann were caught making repeated fraudulent statements to investors, essentially leading them to believe that Remoxy was on its way to be approved when, in reality, they knew it was unlikely to receive FDA clearance. (FAC ¶ 266; Ex. 8 at 36.)</p>	FAC ¶¶ 267–272	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–296
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331, 345
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365
<p>Mr. Barry's presence should be viewed with concern by Cassava's shareholders, as he seems eager to join boards of companies suspected or confirmed to have committed various degrees of fraud. (FAC ¶ 266; Ex. 8 at 37.)</p>	FAC ¶¶ 267–272	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–296
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331, 338, 345
		Inherently Improbable:	FAC ¶¶ 347–358

QCM's Defamatory Statements ¹	Cassava's Allegations of Falsity	Cassava's Allegations of Actual Malice	
		Repetition and Republication:	FAC ¶¶ 359–365
<p>It is unclear why Mr. Barry board membership seems overrepresented in controversial companies such as these. Perhaps he hopes to be able to use his clout and connections to support their stocks during turbulent times. No matter what the reason is, his presence on Cassava's board, given the issues we highlighted, should be paid attention to.</p> <p>(FAC ¶ 266; Ex. 8 at 38.)</p>	FAC ¶¶ 267–272	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–296
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331, 348, 345
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365
<p>There are powerful incentives for Cassava's management to possibly commit misconduct in clinical trials, deceiving investors about the real prospects of Simufilam.</p> <p>(FAC ¶ 273; Ex. 8 at 8.)</p>	FAC ¶¶ 274–280	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–296, 298–299
		Contradictory Information:	FAC ¶¶ 305–307
		Common Knowledge in the Scientific Community:	FAC ¶¶ 328–330
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–343, 345–346
		Inherently Improbable:	FAC ¶¶ 347–358

QCM's Defamatory Statements ¹	Cassava's Allegations of Falsity	Cassava's Allegations of Actual Malice	
		Repetition and Republication:	FAC ¶¶ 359–365
<p>Moreover, Cassava's management has somehow managed to approve what looks to us like an outrageous compensation system, literally rewarding short-term stock price fluctuations regardless of more traditional metrics as such as profitability or drug approval milestones.</p> <p>(FAC ¶ 273; Ex. 8 at 9.)</p>	FAC ¶¶ 274–280	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–296
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331, 338, 345
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365
<p>Clearly management would get rich temporarily inflating Cassava's stock price by creating unlikely expectations for the prospect of its only drug, Simufilam. Should the drug then fail to deliver, and we think it will, shareholders will be wiped out, but management will get to keep their large bonuses.</p> <p>(FAC ¶ 273; Ex. 8 at 9.)</p>	FAC ¶¶ 274–280	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–296
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331, 338, 345
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365
<p>Cassava skillfully managed to translate these unsubstantiated claims into stock price appreciation through a well-coordinated campaign to promote its stock and intimidate its critics via social media and various other means.</p>	FAC ¶¶ 274–280	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301

QCM's Defamatory Statements ¹	Cassava's Allegations of Falsity	Cassava's Allegations of Actual Malice	
(FAC ¶ 273; Ex. 8 at 21.)		Contradictory Information:	FAC ¶¶ 302–315
		Common Knowledge in the Scientific Community:	FAC ¶¶ 316–330
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365
<p>Finally, Cassava would be serving as a horrible example for other reckless actors willing to follow the same playbook: falsify the initial research, distort the outcome of preliminary trials, get rich through short-term bonuses, then devastate shareholders and patients when the drug inevitably fails phase III trials.</p> <p>(FAC ¶ 273; Ex. 8 at 38.)</p>	FAC ¶¶ 274–280	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315
		Common Knowledge in the Scientific Community:	FAC ¶¶ 316–330
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365

QCM's Defamatory Statements ¹	Cassava's Allegations of Falsity	Cassava's Allegations of Actual Malice	
<p>We believe that Cassava Sciences is a terrible scheme to enrich management at the expenses of other shareholders. For those who are interested in learning more I would suggest reading our report on the company which is entertaining as well as informative.</p> <p>(FAC ¶ 161; Ex. 14 at 4.)</p>	FAC ¶¶ 162–167	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315
		Common Knowledge in the Scientific Community:	FAC ¶¶ 316–330
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365
<p>Along with other skeptics, we have discovered convincing evidence that this is not so. The compound has been discovered by a Chinese scientist from CUNY named Dr. Wang. Many forensics experts have found evidence of forgery in several papers published by this individual, including in critical research supporting Cassava's only drug, Simufilam.</p> <p>(FAC ¶ 161; Ex. 14 at 4.)</p>	FAC ¶¶ 162–167	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315
		Common Knowledge in the Scientific Community:	FAC ¶¶ 316–330
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346

QCM's Defamatory Statements ¹	Cassava's Allegations of Falsity	Cassava's Allegations of Actual Malice	
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365
<p>Also, we showed how the much-touted cognitive improvement of Cassava's drug, may simply be the result of biased patient enrollment and cherry picking of data.</p> <p>(FAC ¶ 239; Ex. 14 at 4.)</p>	FAC ¶¶ 240–245	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315
		Common Knowledge in the Scientific Community:	FAC ¶¶ 316–323, 330
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–341, 345–346
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365
<p>In addition to this, our proprietary due diligence discovered that many key actors involved in the testing of this drug have a highly questionable past (e.g. former felons, fraudsters, drug addicts) and may have been in conflict of interest.</p> <p>(FAC ¶ 258; Ex. 14 at 4.)</p>	FAC ¶¶ 259–265	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 295
		Inherently Improbable:	FAC ¶¶ 331, 338, 345

QCM's Defamatory Statements ¹	Cassava's Allegations of Falsity	Cassava's Allegations of Actual Malice	
		Repetition and Republication:	FAC ¶¶ 347–358
<p>Of course \$PFE would be thrilled of partnering again with \$SAVA after the “spectacular” success of their former partnership with Remoxy and on a drug tainted with multiple allegations of fraudulent research like Simufilam</p> <p>QCM via Twitter (FAC App. A at 7.)</p>	<p>FAC ¶¶ 7, 17, 162–167, 175–178, 180–188, 190–196, 198–203, 211–214, 216–221, 228–230, 232–238, 240–245, 247–251, 286–287</p>	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315
		Common Knowledge in the Scientific Community:	FAC ¶¶ 316–330
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365, 378–381
<p>The situation was NOT rectified as there was no close out letter from the FDA. Those letters ARE rare (roughly 1% of inspections results in one warning). Evidence that IMIC is incompetent in running trials and you have yourself why SAVA chose them</p> <p>QCM via Twitter (App. A at 7.)</p>	<p>FAC ¶¶ 7, 17, 259–265, 286–287</p>	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Inherently Improbable:	FAC ¶¶ 347–358

QCM's Defamatory Statements ¹	Cassava's Allegations of Falsity	Cassava's Allegations of Actual Malice	
		Repetition and Republication:	FAC ¶¶ 359–365, 378–381
<p>There is a preponderance of evidence and opinion from world's leading experts. If you wanna ignore that feel free to do so. You'll wake up one day and face the bitter reality.</p> <p>QCM via Twitter (App. A at 7.)</p>	FAC ¶¶ 7, 17, 162–167, 286–287	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365, 378–381
<p>That the SAVA study was bad doesn't mean that all the studies IMIC does are bad. But given what we shared about that clinic you must be either in bad faith or you haven't read the report</p> <p>QCM via Twitter (App. A at 7.)</p>	FAC ¶¶ 7, 17, 259–265, 286–287	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315
		Common Knowledge in the Scientific Community:	FAC ¶¶ 316–330
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Inherently Improbable:	FAC ¶¶ 347–358

QCM's Defamatory Statements ¹	Cassava's Allegations of Falsity	Cassava's Allegations of Actual Malice	
		Repetition and Republication:	FAC ¶¶ 359–365, 378–381
<p>We have read with interest \$SAVA's latest press release. Clearly there is a conflict between the citizen's petition (which we found credible) and what the journal declared today. We caution that nothing in that release invalidates our own, well referenced, findings</p> <p>QCM via Twitter (App. A at 7.)</p>	FAC ¶¶ 7, 17, 162–167, 180–188, 198–203, 286–287	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315
		Common Knowledge in the Scientific Community:	FAC ¶¶ 316–330
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365, 378–381
<p>*** We are about to release a fresh analysis by Dr. John Carlisle on the \$SAVA Simufilam trials. He is considered a premiere authority on detecting falsification of clinical papers through statistical analysis *** @AlderLaneeggs @Adrian_H</p> <p>QCM via Twitter (App. A at 8.)</p>	FAC ¶¶ 7, 17, 162–167, 175–178, 180–188, 190–196, 198–203, 211–214, 216–221, 228–230, 232–238, 240–245, 247–251, 286–287	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315
		Common Knowledge in the Scientific Community:	FAC ¶¶ 316–330

QCM's Defamatory Statements ¹	Cassava's Allegations of Falsity	Cassava's Allegations of Actual Malice	
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365, 378–381
https://dropbox.com/s/cc60dmd4blzyd6j/John%20Carlisle%20Analysis.pdf?dl=0... Link to Dr. John Carlisle analysis on Cassava's Simufilam 's trials. Multiple instances of FALSE DATA have been detected. Further investigation warranted and important. QCM via Twitter (App. A at 8.)	FAC ¶¶ 7, 17, 162–167, 175–178, 180–188, 190–196, 198–203, 211–214, 216–221, 228–230, 232–238, 240–245, 247–251, 286–287	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315
		Common Knowledge in the Scientific Community:	FAC ¶¶ 316–330
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365, 378–381
This looks damning to us ² QCM via Twitter (App. A at 9.)		Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301

² This is a Retweet of a Tweet thread that includes screenshots of emails with the Editor-in-Chief of the *Journal of Neuroscience* regarding Dr. Wang and western blots.

QCM's Defamatory Statements ¹	Cassava's Allegations of Falsity	Cassava's Allegations of Actual Malice	
	FAC ¶¶ 7, 17, 162–167, 180–188, 198–203, 286–287	Contradictory Information:	FAC ¶¶ 302–315
		Common Knowledge in the Scientific Community:	FAC ¶¶ 316–330
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365, 378–381
<p>Marc thank you for your invaluable support. Beyond all the nonsense, we did succeed to shine a spotlight and to explain, to whoever is willing to listen, what's truly going on with this company. The ultimate consequences for \$SAVA are UNAVOIDABLE, though timing is uncertain.</p> <p>QCM via Twitter (App. A at 12.)</p>	FAC ¶¶ 7, 17, 162–167, 286–287	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Repetition and Republication:	FAC ¶¶ 359–365, 378–381
<p>https://investorplace.com/2021/11/sava-stock-is-a-sell-after-accusations-of-data-manipulation/... I enjoyed the intellectual honesty and willingness to change his mind when presented with new facts of @larryramer (a former \$SAVA bull). His piece is a must-read if you are following the \$SAVA affair</p>	FAC ¶¶ 7, 17, 162–167, 175–178, 180–188, 190–196, 198–203, 211–214, 216–221, 228–230, 232–	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315

QCM's Defamatory Statements ¹	Cassava's Allegations of Falsity	Cassava's Allegations of Actual Malice	
QCM via Twitter (App. A at 12.)	238, 240–245, 247–251, 286–287	Common Knowledge in the Scientific Community:	FAC ¶¶ 316–330
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365, 378–381
Cheer up! This (allegedly) evil entity has some many ways to die: ANY journal retraction, FDA, SEC, NIH, defections, and others QCM via Twitter (App. A at 12.)	FAC ¶¶ 7, 17, 162–167, 180–188, 198–203, 247–251, 274–280, 286–287	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365, 378–381
The bull is still puffing and charging for a while after the matador has thrust his deadly sword: it matters not, as soon its lifeless body will be hitting the floor with a loud thud, nonetheless \$sava QCM via Twitter (App. A at 13.)	FAC ¶¶ 7, 17, 162–167, 286–287	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315

QCM's Defamatory Statements ¹	Cassava's Allegations of Falsity	Cassava's Allegations of Actual Malice	
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Repetition and Republication:	FAC ¶¶ 359–365, 378–381
<p>Yes you are right. We got the same result. It appears the last two images on the right have been added. The background is visibly different</p> <p>QCM via Twitter (App. A at 14.)</p>	<p>FAC ¶¶ 7, 17, 162–167, 175–178, 180–188, 190–196, 198–203, 211–214, 216–221, 228–230, 232–238, 240–245, 247–251, 286–287</p>	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315
		Common Knowledge in the Scientific Community:	FAC ¶¶ 316–330
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365, 378–381
<p>Can anybody spot a problem with the (enhanced) picture on the right? If I understand correctly, this is the “original” image that was sent by Cassava to the journal who then proceeded to approve and caused a 50% rally. Unreal!</p> <p>QCM via Twitter (App. A at 14.)</p>	<p>FAC ¶¶ 7, 17, 162–167, 175–178, 180–188, 190–196, 198–203, 211–214, 216–221, 228–230, 232–</p>	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315

QCM's Defamatory Statements ¹	Cassava's Allegations of Falsity	Cassava's Allegations of Actual Malice	
	238, 240–245, 247–251, 286–287	Common Knowledge in the Scientific Community:	FAC ¶¶ 316–330
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365, 378–381
<p>What they are doing is astounding and, frankly, desperate. They are making a joke of market abuse rules and of the clinical research process. They must not be allowed to get away with this.</p> <p>QCM via Twitter (App. A at 15.)</p>	FAC ¶¶ 7, 17, 162–167, 286–287	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365, 378–381
<p>We applaud the federal government's decision to investigate wrongdoing at \$SAVA. Once again, skeptics and short-sellers have proven a force for good in the market, exposing misconduct and warning shareholders of impending danger @AlderLaneeggs @muddywatersre @HindenburgRes</p>	FAC ¶¶ 7, 17, 162–167, 286–287	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315

QCM's Defamatory Statements ¹	Cassava's Allegations of Falsity	Cassava's Allegations of Actual Malice	
QCM via Twitter (App. A at 17.)		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Repetition and Republication:	FAC ¶¶ 359–365, 378–381
<p>Read our report (pinned on this account). Management's bonuses are tied to short-term market cap goals, not drug approval milestones. They make money even if phase 3 fails, as long as market cap remains high and there is liquidity to pay themselves</p> <p>QCM via Twitter (App. A at 17.)</p>	FAC ¶¶ 7, 17, 162–167, 267–272, 274–280, 286–287	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365, 378–381
The egregious nature of this scheme is clear for all to see QCM via Twitter (App. A at 19.)	FAC ¶¶ 7, 17, 162–167, 286–287	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Inherently Improbable:	FAC ¶¶ 347–358

QCM's Defamatory Statements ¹	Cassava's Allegations of Falsity	Cassava's Allegations of Actual Malice	
		Repetition and Republication:	FAC ¶¶ 359–365, 378–381
<p>This is damning (yet again). Though only those that pay attention will notice it.³</p> <p>QCM via Twitter (App. A at 19.)</p>	FAC ¶¶ 7, 17, 162–167, 180–188, 198–203, 286–287	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315
		Common Knowledge in the Scientific Community:	FAC ¶¶ 316–330
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365, 378–381
<p>We applaud the WSJ scrutiny on the situation at \$SAVA. We are of the opinion that scrutiny is bound to confirm the skeptics' allegations and eventually bring about the demise of this alleged scheme</p> <p>QCM via Twitter (App. A at 20.)</p>	FAC ¶¶ 7, 17, 162–167, 286–287	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346

³ This is a Quote Tweet of a Tweet discussing an Expression of Concern issued by the *Journal of Neuroscience*.

QCM's Defamatory Statements ¹	Cassava's Allegations of Falsity	Cassava's Allegations of Actual Malice	
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365, 378–381
<p>The bull is still puffing and charging, but it's wound is deadly and it's demise is now near. \$sava</p> <p>QCM via Twitter (App. A at 20.)</p>	FAC ¶¶ 7, 17, 162–167, 286–287	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Repetition and Republication:	FAC ¶¶ 359–365, 378–381
<p>Don't forget a reserve for fines and litigation. There may be hundreds of patients who are sick with Alzheimer disease which could've been treated with something more effective. Some of them, or their families, are going to want blood</p> <p>QCM via Twitter (App. A at 21.)</p>	FAC ¶¶ 7, 17, 162–167, 286–287	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365, 378–381

QCM's Defamatory Statements ¹	Cassava's Allegations of Falsity	Cassava's Allegations of Actual Malice	
<p>Though in all fairness, they didn't dare putting their faces on it until now. I think other skeptics have been braver, if perhaps less immediately effective</p> <p>QCM via Twitter (App. A at 21.)</p>	FAC ¶¶ 7, 17, 162–167, 286–287	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365, 378–381
<p>\$SAVA couldn't have put together this circus without assistance from multiple people and entities. You are either with us or with Cassava. If you have been unknowingly part of this deception, I suggest you resign immediately before we start calling you out individually.</p> <p>QCM via Twitter (App. A at 21.)</p>	FAC ¶¶ 7, 17, 162–167, 286–287	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365, 378–381
<p>Some people would better resign if they have an ounce of intelligence left in them</p>	FAC ¶¶ 7, 17, 286–287	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301

QCM's Defamatory Statements ¹	Cassava's Allegations of Falsity	Cassava's Allegations of Actual Malice	
QCM via Twitter (App. A at 21.)		Contradictory Information:	FAC ¶¶ 302–315
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Repetition and Republication:	FAC ¶¶ 359–365, 378–381
<p>It's really not that difficult to settle. I could tell that the “original” submitted to that journal was a fake just by increasing the contrast on my iPhone (see photo above). Anyone can do that. But no amount of evidence can convince someone who refuses to listen</p> <p>QCM via Twitter (App. A at 21.)</p>	FAC ¶¶ 7, 17, 162–167, 175–178, 180–188, 190–196, 198–203, 211–214, 216–221, 228–230, 232–238, 240–245, 247–251, 286–287	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315
		Common Knowledge in the Scientific Community:	FAC ¶¶ 316–330
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365, 378–381
<p>For context, a SAVA “Twitter warrior” seems to imply that Lindsay Burns, An executive of Cassava, regularly feeds him non-public information through the chat “Discord”. Lawyers please come forward about the legality of this</p> <p>QCM via Twitter (App. A at 23.)</p>	FAC ¶¶ 7, 17, 267–272, 274–280, 286–287	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315

QCM's Defamatory Statements ¹	Cassava's Allegations of Falsity	Cassava's Allegations of Actual Malice	
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365, 378–381
Remi, Lindsay...what are you hiding??? QCM via Twitter (App. A at 23.)	FAC ¶¶ 7, 17, 267–272, 274–280, 286–287	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365, 378–381
As @ClarityToast noted, \$SAVA has quietly removed its Scientific Board webpage...what are Remy and Lindsay afraid of? Let's teach them a lesson: you cannot delete anything on the web! https://web.archive.org/web/20211103141115/https://www.cassavasciences.com/scientific-advisory-board ... Feel free to send us information if you find anything odd QCM via Twitter (App. A at 23.)	FAC ¶¶ 7, 17, 162–167, 267–272, 286–287	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346

QCM's Defamatory Statements ¹	Cassava's Allegations of Falsity	Cassava's Allegations of Actual Malice	
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365, 378–381
<p>Here is what \$SAVA's management seems to be trying to hide from you...</p> <p>QCM via Twitter (App. A at 23.)</p>	FAC ¶¶ 7, 17, 162–167, 267–272, 286–287	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365, 378–381
<p>We recognize this might be a technical problem or similar. Though we note that some members of the scientific board have apparently denied their involvement with \$SAVA. So, it might be smart removing that page with the SEC sniffing around...</p> <p>QCM via Twitter (App. A at 23.)</p>	FAC ¶¶ 7, 17, 162–167, 267–272, 286–287	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Inherently Improbable:	FAC ¶¶ 347–358

QCM's Defamatory Statements ¹	Cassava's Allegations of Falsity	Cassava's Allegations of Actual Malice	
		Repetition and Republication:	FAC ¶¶ 359–365, 378–381
<p>We are running a full background check on this person: you'd better not have any skeletons Vinay!</p> <p>QCM via Twitter (App. A at 24.)</p>	FAC ¶¶ 7, 17, 162–167, 286–287	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365, 378–381
<p>All of this is going to the SEC</p> <p>QCM via Twitter (App. A at 24.)</p>	FAC ¶¶ 7, 17, 162–167, 286–287	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Repetition and Republication:	FAC ¶¶ 359–365, 378–381
		Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301

QCM's Defamatory Statements ¹	Cassava's Allegations of Falsity	Cassava's Allegations of Actual Malice	
<p>Making false statements about a stock, while demonstrably knowing they are wrong and holding that stock, is the very definition of market manipulation</p> <p>QCM via Twitter (App. A at 25.)</p>	<p>FAC ¶¶ 7, 17, 162–167, 267–272, 274–280, 286–287</p>	Contradictory Information:	FAC ¶¶ 302–315
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365, 378–381
<p>Just as the “independent” lab ended up being Wang’s, it’s legitimate to assume that these two statisticians may not be as independent. Given the precedents, the burden of proof should be in \$SAVA. And the fact that their names haven’t yet been made public stinks to high heaven</p> <p>QCM via Twitter (App. A at 25.)</p>	<p>FAC ¶¶ 7, 17, 162–167, 180–188, 286–287</p>	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365, 378–381
<p>Given that they have been caught lying multiple times (e.g. Remoxy approval, independent lab) burden of proof must be on \$SAVA, especially given the absurd changes in baseline highlighted multiple times and detected by Dr. Carlisle (expert in statistical fraud detection)</p>	<p>FAC ¶¶ 7, 17, 162–167, 267–272, 286–287</p>	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315

QCM's Defamatory Statements ¹	Cassava's Allegations of Falsity	Cassava's Allegations of Actual Malice	
QCM via Twitter (App. A at 25.)		Common Knowledge in the Scientific Community:	FAC ¶¶ 316–330
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365, 378–381
The odds are zero, given the multiple problems highlighted and the people involved QCM via Twitter (App. A at 25.)	FAC ¶¶ 7, 17, 169–173, 267–272, 286–287	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Repetition and Republication:	FAC ¶¶ 359–365, 378–381
These are the highly professional-looking clinical teams testing \$SAVA “game changing” drug Simufilam. This is not a joke... https://fb.watch/9qm47YHXzI/ QCM via Twitter (App. A at 26.)	FAC ¶¶ 7, 17, 162–167, 286–287	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346

QCM's Defamatory Statements ¹	Cassava's Allegations of Falsity	Cassava's Allegations of Actual Malice	
		Repetition and Republication:	FAC ¶¶ 359–365, 378–381
The next thing to be “nuked” at \$SAVA might well be its actual board (of directors). And it won't be Remy pulling the trigger... QCM via Twitter (App. A at 26.)	FAC ¶¶ 7, 17, 162–167, 267–272, 286–287	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Repetition and Republication:	FAC ¶¶ 359–365, 378–381
After reading this exchange it finally hit me why Cassava stock price is behaving the way it is! QCM via Twitter (App. A at 26.)	FAC ¶¶ 7, 17, 162–167, 286–287	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Repetition and Republication:	FAC ¶¶ 359–365, 378–381
There has been a scary degree of intellectual dishonesty, carelessness, cognitively biased thinking and sheer stupidity QCM via Twitter (App. A at 27.)	FAC ¶¶ 7, 17, 162–167, 267–272, 286–287	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315

QCM's Defamatory Statements ¹	Cassava's Allegations of Falsity	Cassava's Allegations of Actual Malice	
		Common Knowledge in the Scientific Community:	FAC ¶¶ 316–330
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365, 378–381
Cassava fraud and Alzheimer's capitalism – For Better Science ⁴ QCM via Twitter (App. A at 39.)	FAC ¶¶ 7, 17, 162–167, 286–287	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315
		Common Knowledge in the Scientific Community:	FAC ¶¶ 316–330
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365, 378–381

⁴ This Tweet includes a link to a post titled the same (<https://forbetterscience.com/2021/12/15/cassava-fraud-and-alzheimers-capitalism/>).

QCM's Defamatory Statements ¹	Cassava's Allegations of Falsity	Cassava's Allegations of Actual Malice	
<p>This is the beginning of the end for this evil entity. The other articles are going to fall like dominoes as well. Next is likely the sound of handcuffs for all responsible of making a mockery of the US healthcare system</p> <p>QCM via Twitter (App. A at 41–42.)</p>	FAC ¶¶ 7, 17, 162–167, 267–272, 286–287	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315
		Common Knowledge in the Scientific Community:	FAC ¶¶ 316–330
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365, 378–381
<p>\$SAVA you have been caught red handed! Stop the trials and spare the patients your useless treatment! #Savastoptheuselesstrials</p> <p>QCM via Twitter (App. A at 42.)</p>	FAC ¶¶ 7, 17, 162–167, 286–287	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315
		Common Knowledge in the Scientific Community:	FAC ¶¶ 316–330
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346

QCM's Defamatory Statements ¹	Cassava's Allegations of Falsity	Cassava's Allegations of Actual Malice	
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365, 378–381
<p>Beware: Desperate \$SAVA bulls are circulating a patently forged DOJ letter claiming a an investigation against short sellers. Numerous mistakes starting from my last name and United Dept. of Justice instead of United States. This is a textbook case of market manipulation⁵</p> <p>Stock price increased over 10% because of this “news”</p> <p>QCM via Twitter (App. A at 47.)</p>	FAC ¶¶ 7, 17, 274–280, 286–287	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Repetition and Republication:	FAC ¶¶ 359–365, 378–381
<p>[Quoting tweet that reads:</p> <p>✅ No academic center!👉</p> <p>✅ No more a Scientific Advisory Board 🧑🔬</p> <p>✅ CP, @MicrobiomDigest and others Phd \$TWIT contributors showed that #Burns_Wang papers were forged 📄</p> <p>✅ @QCMFunds showed that trials were rigged.. ⚠️</p> <p>✅ #FDA investigates \$SAVA</p>	FAC ¶¶ 7, 17, 162–167, 175–178, 286–287	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315
		Common Knowledge in the Scientific Community:	FAC ¶¶ 316–330

⁵ This Tweet includes what purports to be an image of a letter from the DOJ regarding an inquiry for information of a criminal investigation into short-sellers confirming there is an open investigation.

QCM's Defamatory Statements ¹	Cassava's Allegations of Falsity	Cassava's Allegations of Actual Malice	
<p>OMG !🐒🐒🐒]</p> <p>That sums it up rather well</p> <p>QCM via Twitter (App. A at 51.)</p>		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365, 378–381
<p>Fighting for justice to arrive, on step at the time.⁶</p> <p>QCM via Twitter (App. A at 53.)</p>	FAC ¶¶ 7, 17, 162–167, 286–287	Improper Motive:	FAC ¶¶ 290–294
		Repetition and Republication:	FAC ¶¶ 359–365
<p>Contradicting himself three times in a single sentence:</p> <p>“There is zero evidence, zero credible evidence, zero proof that I’ve ever engaged in, nor anyone I know, has ever engaged in funny business.” Remi Barbier, CEO \$SAVA⁷</p> <p>Kudos to the New Yorker for catching this</p> <p>QCM via Twitter (App. A at 53.)</p>	FAC ¶¶ 7, 17, 267–272, 274–280, 286–287	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Repetition and Republication:	FAC ¶¶ 359–365, 378–381
<p>IMIC just changed the description of Juana Pelegri from PhD to “candidate”. Indirectly confirming that the previous description was a lie, as we highlighted in our report. I guess it’s housecleaning just in case the FDA shows up (again)</p>	FAC ¶¶ 7, 17, 253–257, 286–287	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301

⁶ This Tweet links to a profile on Jordan Thomas published in *the New Yorker*, which details his work for Brett and Pitt and the filing of the Citizen Petition.

⁷ This Tweet features a GIF of Pinocchio with a growing nose.

QCM's Defamatory Statements ¹	Cassava's Allegations of Falsity	Cassava's Allegations of Actual Malice	
<p>This is \$SAVA's main clinical center arguably</p> <p>For the sake of clarity, this fake PhD person was interviewed by IMIC as an "expert" in Alzheimer's diagnosis. If these people are diagnosing AD for the \$SAVA study, no wonder the clinical trials end up questionable (or worse)</p> <p>Enjoy IMIC interviewing her own employee as a "doctor", PhD, and expert in diagnosis and treatment of AD and also a trained clinical psychologist. Seems all fake. All we found on Pelegri was a license as an x-ray technician expired 6 years ago.</p> <p>https://youtu.be/Bijlmd1Kq6A</p> <p>QCM via Twitter (App. A at 53–54.)</p>		Contradictory Information:	FAC ¶¶ 302–315
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Repetition and Republication:	FAC ¶¶ 359–365, 378–381
<p>\$SAVA is slowly advancing toward its doom. It should have imploded in November, but it endured thanks to shameless market shenanigans. Now it's on its way down thanks to the efforts of dedicated scientists fighting for truth</p> <p>QCM via Twitter (App. A at 56.)</p>	FAC ¶¶ 7, 17, 274–280, 286–287	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Repetition and Republication:	FAC ¶¶ 359–365, 378–381
<p>Citizen's Petition denied on purely procedural grounds. FDA takes the \$SAVA complaint very seriously. ...and may take further action</p> <p>QCM via Twitter (App. A at 61.)</p>	FAC ¶¶ 7, 17, 162–167, 286–287	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Repetition and Republication:	FAC ¶¶ 359–365, 378–381
		Improper Motive:	FAC ¶¶ 290–291, 294

QCM's Defamatory Statements ¹	Cassava's Allegations of Falsity	Cassava's Allegations of Actual Malice	
<p>I just became a big fan of @Official_WSB reading the comments to this obvious, desperate pumping attempt by some \$SAVA bull on gbrir chat. The comments are priceless. Thanks WSB you made my day!⁸</p> <p>QCM via Twitter (App. A at 61.)</p>	FAC ¶¶ 7, 17, 274–280, 286–287	Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315
		Common Knowledge in the Scientific Community:	FAC ¶¶ 316–330
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365, 378–381
<p>Ladies and gentlemen, this is egregious. This compares the analysis of \$SAVA Simufilam effectiveness when performed by an external lab (black dots) vs when performed by Wang (whose comp is tied to Cassava's stock price). Wang's version looks statistically nearly impossible</p> <p>QCM via Twitter (App. A at 62.)</p>	FAC ¶¶ 7, 17, 162–167, 175–178, 286–287	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315
		Common Knowledge in the Scientific Community:	FAC ¶¶ 316–330
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346

⁸ This Tweet includes a link to a Reddit thread from r/wallstreetbets on \$SAVA as well as reply tweets with screenshots of posts from Reddit with inflammatory language about Cassava, e.g., “It’s fine if you don’t wanna hear it, but I think this company is full of sh*t...”

QCM's Defamatory Statements ¹	Cassava's Allegations of Falsity	Cassava's Allegations of Actual Malice	
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365, 378–381
Amazed this company is still around QCM via Twitter (App. A at 72.)	FAC ¶¶ 7, 17, 162–167, 175–178, 286–287	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365, 378–381
SSAVA CEO not mentioning recent critical papers retractions by Wang during the fireside talk ⁹ QCM via Twitter (App. A at 79.)	FAC ¶¶ 7, 17, 175–178, 267–272, 286–287	Improper Motive:	FAC ¶¶ 290–291, 294
		Contradictory Information:	FAC ¶¶ 302–315
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Repetition and Republication:	FAC ¶¶ 359–365, 378–381

⁹ This Tweet includes a GIF that says, “FEEL LIKE THERE’S AN ELEPHANT IN THE ROOM.”

QCM's Defamatory Statements ¹	Cassava's Allegations of Falsity	Cassava's Allegations of Actual Malice	
<p>Glad this story is finally getting the attention it deserves. Patients may have been suffering needlessly, public money may have been wasted and we then the usual mockery of the capital markets by bad actors. But you can't fool everyone all the time...</p> <p>QCM via Twitter (App. A at 84.)</p>	FAC ¶¶ 7, 17, 162–167, 274–280, 286–287	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315
		Common Knowledge in the Scientific Community:	FAC ¶¶ 316–330
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365, 378–381
<p>Unfortunately, @CUNY's seeming reluctance to swiftly and transparently put an end to the \$SAVA affair makes me fear that there might well be an element of collusion or perhaps an attempt to cover up</p> <p>QCM via Twitter (App. A at 84.)</p>	FAC ¶¶ 7, 17, 162–167, 286–287	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365, 378–381

QCM's Defamatory Statements ¹	Cassava's Allegations of Falsity	Cassava's Allegations of Actual Malice	
As the saying goes: "rats" leaving the sinking ship? QCM via Twitter (App. A at 88.)	FAC ¶¶ 7, 17, 162–167, 286–287	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Repetition and Republication:	FAC ¶¶ 359–365, 378–381
When the allegations will be confirmed in any of the multiple ongoing federal investigations, that number is heading towards 100% (QCM opinion) QCM via Twitter (App. A at 91.)	FAC ¶¶ 7, 17, 162–167, 286–287	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Repetition and Republication:	FAC ¶¶ 359–365, 378–381
Kudos to brave Adrian for pressuring CUNY in doing its job and informing the public on the \$SAVA affair ¹⁰ QCM via Twitter (App. A at 91.)	FAC ¶¶ 7, 17, 162–167, 286–287	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315

¹⁰ This is a Quote Tweet of a Tweet from co-Defendant Adrian Heilbut stating, in part, "City University of New York is the epicenter of the Cassava \$SAVA fraud," and linking to a YouTube video titled "Submission to the May 9 2022 CUNY Trustees Queens Public Burrough Hearing."

QCM's Defamatory Statements ¹	Cassava's Allegations of Falsity	Cassava's Allegations of Actual Malice	
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365, 378–381
<p>Looks like \$SAVA's Vice President Clinical Operations Beckie Carpenter has just resigned her position! No press release from the company, but, hey, transparency is not their thing...</p> <p>QCM via Twitter (App. A at 100.)</p>	FAC ¶¶ 7, 17, 162–167, 286–287	Improper Motive:	FAC ¶¶ 290–291, 294
		Contradictory Information:	FAC ¶¶ 302–315
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Repetition and Republication:	FAC ¶¶ 359–365, 378–381
<p>Congrats to \$SAVA from featuring on the world's most prestigious scientific magazine for...being a "fraud". Degree of our surprise: zero.¹¹</p> <p>QCM via Twitter (App. A at 102.)</p>	FAC ¶¶ 7, 17, 162–167, 175–178, 286–287	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Inherently Improbable:	FAC ¶¶ 347–358

¹¹ This Tweet links to a Science.org article titled "Potential fabrication in research images threatens key theory of Alzheimer's articles threatening a reigning theory of the disease."

QCM's Defamatory Statements ¹	Cassava's Allegations of Falsity	Cassava's Allegations of Actual Malice	
		Repetition and Republication:	FAC ¶¶ 359–365, 378–381
<p>congratulates to all the brave people that contributed to this and fought for honesty and transparency in the markets: Jordan Thomas (+clients), @MicrobiomDigest @jesse_brodкин @Adrian_H @Nemo_is_NoOne @LogarithmicDis¹²</p> <p>QCM via Twitter (App. A at 106.)</p>	FAC ¶¶ 7, 17, 162–167, 175–178, 286–287	Improper Motive:	FAC ¶¶ 290–291, 294
		Contradictory Information:	FAC ¶¶ 302–315
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Repetition and Republication:	FAC ¶¶ 359–365, 378–381
<p>Two things are infinite: the universe and human stupidity. And I'm not sure about the former. (Albert Einstein)¹³</p> <p>QCM via Twitter (App. A at 111.)</p>	FAC ¶¶ 7, 17, 162–167, 286–287	Improper Motive:	FAC ¶¶ 290–291, 294
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Repetition and Republication:	FAC ¶¶ 359–365, 378–381
<p>Yeah right. Much better to keep giving lumbar punctures to innocent elderly people to use them as Guinea pigs for a drug based on allegedly questionable (forged?) evidence. All this to cash out on bonuses tied to short term stock price performance.</p> <p>QCM via Twitter (App. A at 119.)</p>	FAC ¶¶ 7, 17, 162–167, 175–178, 274–280, 286–287	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315
		Common Knowledge in the Scientific Community:	FAC ¶¶ 316–330

¹² This tweet links to a Reuters article titled “Exclusive: Cassava Sciences faces U.S. criminal probe tied to Alzheimer’s drug, sources say.”

¹³ This Tweet includes a screenshot of a chart showing Cassava’s stock increasing in value.

QCM's Defamatory Statements ¹	Cassava's Allegations of Falsity	Cassava's Allegations of Actual Malice	
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365, 378–381
<p>If you bother reading the report (rather than the contrived allegations of the bulls) you will see that it is factual and matter of fact. There is nothing misleading, false or unethical. I have offered to amend if I inadvertently published anything incorrect. Still waiting</p> <p>QCM via Twitter (App. A at 120.)</p>	FAC ¶¶ 7, 17, 274–280, 286–287	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315
		Common Knowledge in the Scientific Community:	FAC ¶¶ 316–330
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365, 378–381
<p>Is there some sort of Guinness record for the number of problem-papers published? If so, Wang might hope for a prize should his career as a researcher be terminated due to this whole affair...</p> <p>QCM via Twitter (App. A at 120.)</p>	FAC ¶¶ 7, 17, 175–178, 180–188, 286–287	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315

QCM's Defamatory Statements ¹	Cassava's Allegations of Falsity	Cassava's Allegations of Actual Malice	
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Repetition and Republication:	FAC ¶¶ 359–365, 378–381
<p>\$SAVA Barbier: 20% of study patients may not have Alzheimer's. We have been saying this all along and if you recall in a previous presentation they denied this allegation. Non-AD patients may bias the sample and distort the study results as their cognitive decline isn't as marked</p> <p>QCM via Twitter (App. A at 122.)</p>	FAC ¶¶ 7, 17, 162–167, 175–178, 267–272, 286–287	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315
		Common Knowledge in the Scientific Community:	FAC ¶¶ 316–330
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365, 378–381
<p>What's been happening to \$SAVA stock during the last few weeks, and particularly during the last 48 hours, looks to me like a textbook case of market manipulation.</p> <p>QCM via Twitter (App. A at 125.)</p>	FAC ¶¶ 7, 17, 162–167, 274–280, 286–287	Improper Motive:	FAC ¶¶ 290–291, 294
		Lack of Evidence:	FAC ¶¶ 295–301
		Contradictory Information:	FAC ¶¶ 302–315
		Purposeful Avoidance of the Truth:	FAC ¶¶ 331–346

QCM’s Defamatory Statements ¹	Cassava’s Allegations of Falsity	Cassava’s Allegations of Actual Malice	
		Inherently Improbable:	FAC ¶¶ 347–358
		Repetition and Republication:	FAC ¶¶ 359–365, 378–381